To:
United States Department of Justice
Civil Rights Division – Criminal Section
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

RE: Petition for Writ of Mandamus & Immediate Federal Oversight – Systemic Judicial, Prosecutorial, and Law Enforcement Corruption in Dare County, North Carolina

To the Honorable Officials of the United States Department of Justice:

I come before you not as a solitary complainant, but as a witness and victim to a judicial district that has descended into a state of pervasive, organized lawlessness.
What follows is not rumor, nor conjecture, but a documented and corroborated record of a self-protecting network of power in Dare County, North Carolina — where judges, prosecutors, sheriffs, and court officials operate not as impartial servants of justice, but as an entrenched syndicate of influence, shielded by fraternal bonds, political patronage, and mutual self-preservation.

This is a matter of urgent national interest.
The corruption here is not episodic — it is structural, woven into the daily function of the court, and weaponized against those who would challenge it. The result is a judicial environment where constitutional rights are not merely disregarded, but deliberately sabotaged; where due process is contingent upon political loyalty; and where those entrusted to enforce the law instead conspire to circumvent it for personal, financial, and political gain.

The Constitution's promise of equal protection under the law and due process of law is not a suggestion. It is an obligation — one that Dare County's legal apparatus has abandoned. When the very institutions charged with upholding the law instead engage in a pattern of racketeering, retaliation, and civil rights violations, it falls within the solemn duty of the United States Department of Justice to intervene.

This petition invokes your authority under:

28 U.S.C. § 1361 – Mandamus to compel the performance of constitutional and statutory duties;

18 U.S.C. §§ 241, 242 – Conspiracy and deprivation of rights under color of law;

18 U.S.C. §§ 1503, 1512 – Obstruction of justice and witness retaliation;

42 U.S.C. § 1983 – Civil action for deprivation of rights;

18 U.S.C. § 1962 (RICO) – For the pattern of racketeering activity herein described; and

All attendant regulations, including DOJ Civil Rights Division mandate and Office of Professional Responsibility oversight authority.

The evidence to follow will establish, beyond reasonable doubt, that Dare County's legal system has been compromised by judicial bias, prosecutorial misconduct, law enforcement malfeasance, and administrative collusion — to such a degree that local remedies are structurally unavailable. This is not a courthouse in need of reform; it is a courthouse in need of federal receivership.

Accordingly, I respectfully — yet urgently — petition this Department to exercise its full investigative and prosecutorial powers, to secure the constitutional rights of every citizen subject to this corrupted jurisdiction, and to restore the rule of law where it has been methodically dismantled.

I. Identification of Principal Actors in the Corruption Scheme

The systemic corruption within Dare County does not exist in abstraction — it has architects, beneficiaries, and enforcers. The following individuals are not merely incidental participants, but integral components of a coordinated network whose power is sustained through mutual protection, retaliation against dissent, and the calculated manipulation of the judicial process.

Each name herein is tied to specific acts of misconduct, ethical breaches, or enabling behavior, supported by documented incidents, witness testimony, and corroborating evidence. Their positions — judicial, prosecutorial, law enforcement, or administrative — are not shields from accountability but rather the very conduits through which misconduct has been perpetrated.

In identifying these actors, this petition seeks not only to establish the scope of the corruption, but to demonstrate that it is systemic in nature, rooted in relationships of influence that transcend official duties and breach the public trust. These actors have operated in concert or parallel to preserve their control, obstruct investigations, and insulate themselves from legal consequence.

The individuals listed below will be addressed with specificity, including their role, authority, and the manner in which they have contributed to or facilitated the ongoing deprivation of constitutional rights within Dare County.

Judge Jerry R. Tillett

Affiliations: Active Shriner; long-standing ties to fraternal organizations with influence over local governance.

Documented Misconduct: Subject of multiple North Carolina Judicial Standards Commission actions in 2013, 2016, and 2019, establishing a pattern of judicial misconduct.

Conflict of Interest: Engaged in an inappropriate personal relationship with then–lead prosecutor Jennifer Karpowicz Bland during overlapping tenures.

Nepotism: Maintains family placement within the Dare County Courthouse, creating a direct pipeline for influence over administrative functions.

Judicial Impropriety in My Case:

Presided over all felony and probation violation cases for the confidential informant (CI) who later entrapped me, yet refused to recuse himself from my proceedings.

Demonstrated blatant disregard for my personal loss, rolling his eyes upon being informed of my father's death during proceedings.

Allegedly engaged in drug and alcohol abuse, compromising judicial fitness.

Exhibited psychopathic patterns of courtroom control, particularly targeting and demeaning women attorneys and defendants.

Ordered an illegal, warrantless urinalysis in the middle of my plea hearing, then extended my sentence based on the presence of legal Delta-8 THC — a direct act of judicial bias and retaliation.

Post-Judicial Position: Now serves on the North Carolina Board of Elections, retaining political influence despite the documented history of misconduct.

Applicable Legal Authorities:

Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) – Judicial recusal required when probability of bias is too high to be constitutionally tolerable.

NC Code of Judicial Conduct, Canons 1, 2A, and 3 – Integrity, impartiality, and avoidance of impropriety.

42 U.S.C. § 1983 – Civil action for deprivation of rights under color of law.

Tumey v. Ohio, 273 U.S. 510 (1927) – Due process violated when judge has a direct, personal, substantial pecuniary interest in reaching a conclusion against a defendant.

District Attorney Jeff Cruden

Affiliations: Confirmed member of the Masonic Lodge, with documented fraternal ties to other principal actors including Sheriff Doug Doughtie and Judge Jerry Tillett, creating an interconnected influence network within Dare County law enforcement and judicial systems.

Prosecutorial Misconduct:

Engaged in selective prosecution, pursuing charges disproportionately and inconsistently, targeting disfavored defendants while declining prosecution in comparable or more severe cases involving associates or political allies.

In his supervisory capacity, permitted Assistant District Attorney Jennifer Karpowicz Bland to present my case to a Grand Jury without full evidentiary support, including absent state lab results, constituting Fraud upon the Court.

Failed in his constitutional duty to ensure disclosure of Brady (exculpatory) and Giglio (impeachment) material, depriving me of evidence essential to my defense.

Nepotism & Improper Influence:

Directly connected to his son, William Cruden, who was terminated from the Kitty Hawk Police Department following a DUI arrest and subsequently rehired within months by the Dare County Sheriff's Department under Sheriff Doug Doughtie's administration, suggesting quid pro quo or nepotistic protectionism.

Applicable Legal Authorities:

Brady v. Maryland, 373 U.S. 83 (1963) – Suppression by the prosecution of evidence favorable to the accused violates due process.

Giglio v. United States, 405 U.S. 150 (1972) – Prosecution's obligation to disclose information affecting witness credibility.

United States v. Armstrong, 517 U.S. 456 (1996) – Selective prosecution claims; Equal Protection Clause violation when prosecution is based on impermissible considerations.

United States v. Williams, 504 U.S. 36 (1992) – Prosecutor's duty of candor in grand jury proceedings.

NC Rules of Professional Conduct, Rule 3.8 – Special responsibilities of a prosecutor.

42 U.S.C. § 1983 – Civil liability for deprivation of rights under color of state law.

Sheriff Doug Doughtie

Affiliations: Confirmed member of the Masonic Lodge, maintaining fraternal ties with District Attorney Jeff Cruden and Judge Jerry Tillett, forming a closed network of influence within Dare County law enforcement and judicial proceedings.

Supervisory Misconduct in My Case:

Knowingly permitted overcharging by approving a charge of Possession With Intent to Sell or Deliver (PWISD) despite the absence of statutory requirements — no baggies, no scales, no drugs seized, no cash, and no predisposition to sell — constituting malicious prosecution and abuse of prosecutorial discretion.

Authorized use of a confidential informant (CI), Tristan Crossley, who was on felony probation with multiple violations, including ongoing violations at the time of the setup, making his participation a direct violation of both North Carolina CI protocol and basic prosecutorial ethics.

Failed to disclose CI identity and background to the defense or the court, directly violating Roviaro v. United States, 353 U.S. 53 (1957), and State v. Dark, 204 N.C. App. 591 (2010), which require disclosure when the informant's testimony is material to the defense.

Pattern of Due Process Violations:

Allowed the Dare County Sheriff's Office to routinely publish arrest and detainment reports on Facebook prior to a defendant's court hearing, creating trial prejudice, tainting jury pools, and undermining the presumption of innocence.

Nepotism & Improper Appointments:

Personally hired both his sons into the Sheriff's Department as high-ranking ("master class") officers, creating an environment of concentrated familial control over law enforcement functions in violation of NC anti-nepotism principles for public office.

Applicable Legal Authorities:

Roviaro v. United States, 353 U.S. 53 (1957) – Government must disclose informant's identity where relevant to the defense.

State v. Dark, 204 N.C. App. 591 (2010) – Informant disclosure mandatory when CI is an active participant in alleged crime.

Malley v. Briggs, 475 U.S. 335 (1986) – Officers liable under §1983 for causing unconstitutional arrests or prosecutions.

Berger v. United States, 295 U.S. 78 (1935) – Law enforcement's role is to see that justice is done, not to win at any cost.

NC Constitution, Art. I, § 19 – Law of the land clause (due process protections).

42 U.S.C. § 1983 – Civil liability for deprivation of constitutional rights under color of state law.

Jennifer Karpowicz Bland

Background & Personal History:

Previously married to a known cocaine distributor in Dare County — a fact that raises severe questions about judgment, criminal associations, and potential conflicts of interest.

Multiple credible witnesses attest to her personal cocaine use both before and during her tenure as Assistant District Attorney, suggesting a serious breach of ethical conduct under Rule 8.4 of the North Carolina Rules of Professional Conduct (Misconduct: Engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation).

Misconduct in My Case:

Knowingly presented an incomplete case to the Grand Jury without full State Bureau of Investigation (SBI) lab results — a direct violation of Napue v. Illinois, 360 U.S. 264 (1959) (prohibiting the knowing presentation of false or misleading evidence).

Misled the court by claiming I did not qualify for conditional discharge under N.C.G.S. § 90-96 despite being a first-time offender, thereby denying me the statutory protections afforded under the law.

Had inappropriate personal and professional relationship with Judge Jerry R. Tillett in Grandy, NC, before stepping down into private practice — constituting a conflict of interest under N.C.G.S. § 14-234 and the NC Judicial Code of Conduct.

Leveraged her former roles as prosecutor and judge to gain an unfair advantage for private clients — evidenced by her own public advertising via Facebook, in violation of Rule 1.11(d) (Special Conflicts of Interest for Former and Current Government Officers and Employees).

Irrelevant Case Manipulation: Introduced an unrelated, unprocessed case from another county during proceedings in my matter, creating prejudice and confusion.

July 15, 2025 Meeting Misconduct:

Repeatedly lied about my eligibility under § 90-96 and about the Sheriff's Office's duty to disclose the identity of my CI — contradicting established precedent in Roviaro v. United States, 353 U.S. 53 (1957), and State v. Dark, 204 N.C. App. 591 (2010).

Discouraged lawful post-conviction relief efforts by warning me not to file motions or pursue relief because it would "upset elected officials," violating my First Amendment right to petition and constituting obstruction of justice under 18 U.S.C. § 1503.

Offered a quid pro quo: A free expungement in ten years if I agreed to remain silent about the misconduct — an act fitting the definition of bribery and witness tampering under 18 U.S.C. §§ 201 and 1512.

Asserted that neither Jennifer Wells nor Judge Tillett knew who my CI was, despite my direct disclosure to Wells before entering my plea — evidence of intentional deception.

Applicable Legal Authorities:

Napue v. Illinois, 360 U.S. 264 (1959) – Prohibits the knowing use of false or misleading evidence.

Brady v. Maryland, 373 U.S. 83 (1963) – Requires disclosure of exculpatory evidence.

Giglio v. United States, 405 U.S. 150 (1972) – Requires disclosure of impeachment evidence, including CI credibility.

Roviaro v. United States, 353 U.S. 53 (1957) – CI disclosure mandatory when informant's identity is relevant to defense.

State v. Dark, 204 N.C. App. 591 (2010) – State-level reinforcement of CI disclosure rules.

N.C.G.S. § 90-96 – Conditional discharge statute for first-time offenders.

NC Rules of Professional Conduct, Rule 8.4 – Misconduct involving dishonesty or conduct prejudicial to the administration of justice.

18 U.S.C. § 201 – Federal bribery statute.

18 U.S.C. § 1512 – Witness tampering statute.

Dare County Sheriff's Department

Institutional Nepotism:

Engages in systemic nepotism, employing and promoting members of the Doughtie, Coltrain, Creech, Kidd, Cruden, Gray, Lester, and Rippons families. Such nepotism creates a closed, self-protective enforcement network that undermines impartiality, public trust, and compliance with N.C.G.S. § 14-234 (Public Officers or Employees Benefiting from Public Contracts).

The hiring of family members in supervisory and operational roles produces a structural conflict of interest and violates the ethical principles outlined in NC Sheriff's Association Code of Ethics and federal anti-nepotism statutes (5 U.S.C. § 3110).

Illegal Use of Confidential Informants:

Authorized the use of a CI (Tristan Crossley) who was on felony probation with multiple violations and therefore ineligible under DOJ guidelines for informant deployment.

CI engaged in entrapment — using four Facebook accounts and two phone numbers to initiate and manipulate interactions, constituting a violation under Sherman v. United States, 356 U.S. 369 (1958) (Predisposition must exist prior to government inducement).

After submitting evidence against me, the CI attempted to sell me drugs a month later — demonstrating misconduct, unreliability, and clear Brady/Giglio impeachment material that was never disclosed.

Failure to Mirandize:

After I voluntarily turned myself in, I was not advised of my Miranda rights before questioning, in direct violation of Miranda v. Arizona, 384 U.S. 436 (1966) and Dickerson v. United States, 530 U.S. 428 (2000).

Statements obtained without Miranda warnings are inadmissible under both federal and state law, yet were used to further the charges.

Coercion & Fabrication of Evidence:

Deputies coerced me into admitting to a crime by citing false claims of overwhelming evidence, violating Miller v. Fenton, 474 U.S. 104 (1985) (Due process prohibits coerced confessions).

This amounts to fraud upon the court when such statements are later used to support charges without disclosing their coercive origin.

CI Recruitment Attempt:

Before my first scheduled court date, detectives pressured me to become a CI and “bust” a personal friend, stating it “would look good to the court.”

This conduct is coercive, retaliatory, and a violation of DOJ Confidential Informant Guidelines (Section II, Subsection C), which explicitly prohibit leveraging pending charges to force informant cooperation.

Applicable Legal Authorities & Maxims:

Miranda v. Arizona, 384 U.S. 436 (1966) – Right to be advised of constitutional rights before custodial interrogation.

Brady v. Maryland, 373 U.S. 83 (1963) – Duty to disclose exculpatory and impeachment evidence.

Giglio v. United States, 405 U.S. 150 (1972) – CI credibility must be disclosed.

Sherman v. United States, 356 U.S. 369 (1958) – Entrapment exists when criminal intent originates with law enforcement.

Miller v. Fenton, 474 U.S. 104 (1985) – Coerced confessions violate Due Process.

5 U.S.C. § 3110 – Federal anti-nepotism statute.

Maxim: "Nemo debet esse judex in propria causa" – No one should be a judge in his own cause (applies to nepotistic control of enforcement agencies).

Jennifer Renee Wells – Former Public Defender, Now District Court Judge

Incompetence & Breach of Fiduciary Duty:

Demonstrated a pattern of grossly inadequate defense in violation of Strickland v. Washington, 466 U.S. 668 (1984) (Effective assistance of counsel is constitutionally required).

Failed to protect my constitutional rights under the Sixth Amendment and N.C. Gen. Stat. § 7A-451(a) (right to competent representation for indigent defendants).

Conflict of Interest:

Did not recuse herself after I personally disclosed the identity of my CI — who she also represented — creating a direct, non-waivable conflict of interest in violation of Holloway v. Arkansas, 435 U.S. 475 (1978).

This conflict tainted all further representation and rendered her legally unfit to continue under N.C. Rules of Professional Conduct 1.7 & 1.9.

Suppression & Mishandling of Discovery:

Rushed through one small portion of discovery showing only sarcastic, non-actioned text messages regarding an ounce price — omitting any physical evidence or corroborating materials.

Did not provide or discuss Brady v. Maryland (1963), Giglio v. United States (1972), or Taylor v. Illinois, 484 U.S. 400 (1988) obligations regarding disclosure of exculpatory evidence and impeachment materials.

Failure to Advocate for ADA Protections:

Did not invoke my protections under the Americans with Disabilities Act, Title II (42 U.S.C. § 12131 et seq.) despite documented qualifying conditions, including:

Diagnosed bipolar disorder

ADHD

Complex PTSD

Documented medication regimen during proceedings

This constitutes discrimination by omission under Tennessee v. Lane, 541 U.S. 509 (2004).

Coercion into Plea Agreement:

Did not inform me of my statutory right to submit multiple plea rebuttals during negotiations.

Coerced me into signing the first plea offer by stating that refusal would guarantee a prison sentence — a clear violation under Brady v. United States, 397 U.S. 742 (1970), where pleas induced by threats are invalid.

Failure to Challenge Judicial Misconduct:

Allowed Judge Jerry R. Tillett to order an impromptu, unlawful urinalysis during my plea hearing without probable cause or legal authority.

Did not object when the judge extended my sentence based on a positive test for Delta-8 THC, which is legal in North Carolina and federally under the 2018 Farm Bill (7 U.S.C. § 1639o et seq.).

Her post-hearing statement that she would "personally see to it" that Delta-8 was added to the Public Defender's prohibited substances policy demonstrates retaliatory collusion with the court.

Unprofessional Admissions & Attitude:

Stated that Judge Tillett was "just old-fashioned" about marijuana while casually admitting she herself has "no problem eating a pot brownie and doing her yard work."

These remarks trivialize judicial misconduct and reveal a dismissive approach to client rights violations.

Political Promotion Immediately After Case:

Elevated to the District Court bench by the Governor directly after my case — raising serious questions about whether her mishandling of my defense was rewarded for protecting other officials from exposure.

Applicable Legal Authorities & Maxims:

Strickland v. Washington, 466 U.S. 668 (1984) – Ineffective assistance of counsel test.

Holloway v. Arkansas, 435 U.S. 475 (1978) – Conflicts of interest in criminal defense.

Brady v. Maryland, 373 U.S. 83 (1963) – Disclosure of exculpatory evidence.

Giglio v. United States, 405 U.S. 150 (1972) – Disclosure of impeachment evidence.

Taylor v. Illinois, 484 U.S. 400 (1988) – Sanctions for nondisclosure.

Tennessee v. Lane, 541 U.S. 509 (2004) – ADA Title II protections in court proceedings.

Brady v. United States, 397 U.S. 742 (1970) – Pleas must be voluntary and informed.

Maxim: "Fiat justitia ruat caelum" – Let justice be done though the heavens fall.

Dean Tolson – Clerk of Superior Court, Former Probation Officer

Background & Position of Authority:

Former probation officer now serving as Clerk of Superior Court for Dare County — a position with direct control over docketing, case flow, and post-conviction relief filings.

Stonewalling of Post-Conviction Relief Motions:

Has knowingly allowed and facilitated the obstruction and stonewalling of my post-conviction relief motions, including Habeas Corpus petitions and related filings.

This constitutes a direct violation of U.S. constitutional precedent and North Carolina statutory law regarding the timely handling of such motions.

Violation of Federal & State Precedent:

28 U.S.C. § 2241 & § 2254 – Federal habeas corpus statutes require timely judicial consideration and prohibit undue delay.

Ex parte Hull, 312 U.S. 546 (1941) – Court officials may not interfere with, delay, or obstruct the filing or consideration of habeas petitions.

Bounds v. Smith, 430 U.S. 817 (1977) – Defendants have the constitutional right to meaningful access to the courts, which includes timely docketing of legal motions.

Johnson v. Avery, 393 U.S. 483 (1969) – State actors may not impede post-conviction review through procedural obstruction.

Impact on Due Process Rights:

By permitting or directing delays in processing my filings, Tolson has contributed to a denial of due process under the Fifth and Fourteenth Amendments.

This also violates Article I, Section 18 of the North Carolina Constitution, which guarantees access to courts without denial or delay.

Probation Officer Background & Conflict of Perspective:

Tolson's prior role as a probation officer raises the appearance of bias in favor of judicial and prosecutorial interests over defendants' rights, particularly in cases involving probation violations and post-conviction review.

Applicable Legal Authorities & Maxims:

Ex parte Hull, 312 U.S. 546 (1941) – No obstruction of habeas petitions.

Bounds v. Smith, 430 U.S. 817 (1977) – Meaningful access to the courts.

Johnson v. Avery, 393 U.S. 483 (1969) – Protection against obstruction of post-conviction relief.

N.C. Const., Art. I, Sec. 18 – Guarantee of open courts and justice without delay.

Maxim: "Justitia est fundamentum regnorum" – Justice is the foundation of kingdoms.

Dare County Clerk of Superior Court – Institutionalized Nepotism & Conflicts of Interest

Systemic Personal Ties to Former and Current Judicial Actors:

Several members of the Dare County Clerk's Office maintain close personal, familial, or social ties to former and current judicial actors, prosecutors, and law enforcement officials.

These relationships have created an environment of entrenched impunity, where misconduct is tolerated, complaints are buried, and case handling reflects personal allegiance over legal duty.

Conflict of Interest by Association:

These personal connections undermine the appearance of neutrality required of clerks under Canon 2 of the North Carolina Code of Judicial Conduct ("A judge [and by extension, court personnel] should avoid impropriety and the appearance of impropriety in all activities").

Such entanglements run afoul of N.C. Gen. Stat. § 7A-171.1, which prohibits court personnel from acting in a manner that compromises the impartiality of judicial proceedings.

Impact on Case Processing:

Filing delays, selective docket management, and unexplained procedural "oversights" have disproportionately affected filings critical to post-conviction relief and misconduct exposure.

This undermines Rule 2.3 of the North Carolina General Rules of Practice, which requires clerks to process all filings promptly and without bias.

Violation of Precedent and Statutory Duty:

In re Murchison, 349 U.S. 133 (1955) – Justice must satisfy the appearance of fairness.

Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) – The Due Process Clause requires recusal or disqualification when there is a probability of actual bias, including through personal ties.

N.C. Const., Art. I, Sec. 18 – Justice must be administered without denial, delay, or prejudice.

Legal Maxims Applicable:

Nemo debet esse judex in propria causa – No one should be judge in their own cause.

Fiat justitia ruat caelum – Let justice be done though the heavens fall.

Brent Doughtie – Post-Sentencing Aggression, Abuse, and Fraternal Influence

Alcohol Abuse & Public Misconduct:

Widely known in Dare County for heavy drinking and volatile behavior, with multiple incidents at Masonic Lodge gatherings where intoxication led to public embarrassment — including in the presence of his father, Sheriff Doug Doughtie.

Masonic & Fraternal Ties:

Holds Masonic membership, part of the fraternal network connecting Sheriff Doug Doughtie, DA Jeff Cruden, and Judge Jerry R. Tillett.

These connections foster a climate of impunity within Dare County law enforcement, obstructing accountability for misconduct.

Post-Sentencing Aggression Toward Defendant:

After my sentencing, during my custody in the Dare County Detention Center, Brent Doughtie engaged in aggressive and intimidating conduct toward me while I was in a heightened state of emotional distress.

His behavior was retaliatory in nature, seemingly intended to humiliate and provoke rather than maintain order.

This constitutes unprofessional and abusive conduct in violation of North Carolina Sheriff's Standards and federal precedent on detainee treatment (Kingsley v. Hendrickson, 576 U.S. 389 (2015)).

FACTUAL BACKGROUND

1. Initial Contact and Confidential Informant Misconduct

In late 2023, I became the direct target of an Entrapment Operation orchestrated by the Dare County Sheriff's Office using Confidential Informant Tristan Marc Crossley.

CI Profile & Disqualifications:

At the time of his recruitment, Crossley was a convicted felon on active probation for multiple felony offenses and already had a documented history of probation violations.

By the time of my case, he had accrued 11 probation violations — yet was still permitted to operate as a CI.

This was a clear violation of DOJ CI Guidelines and the due process principles outlined in United States v. Bernal-Obeso, 989 F.2d 331 (9th Cir. 1993), which hold that law enforcement must disclose impeaching evidence regarding informants and cannot knowingly use unreliable, compromised witnesses.

Pattern of Misconduct:

Crossley used four separate Facebook accounts and two separate phone numbers to contact me repeatedly.

He manufactured a transaction by initiating and sustaining the conversation, creating an appearance of predisposition where none existed.

I had no baggies, no scales, no drugs, no cash, and no predisposition to sell. My comments to him were sarcastic, non-committal, and never acted upon.

Post-Evidence Contact:

After submitting his evidence to the Sheriff's Department in November 2023, Crossley contacted me a month later (January 2024) to offer to sell me drugs, and in that same interaction stole my money.

This constitutes both further entrapment and post-evidence misconduct that should have immediately disqualified him as a witness under Roviaro v. United States, 353 U.S. 53 (1957), and State v. Dark, 204 N.C. App. 591 (2010).

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2. Indictment Before State Lab Results – Fraud Upon the Court

Grand Jury Manipulation:

On or about February 29, 2024, ADA Jennifer Karpowicz Bland presented my case to the Grand Jury without the State Lab results.

This was confirmed to me months later by my public defender, Jennifer Wells, during a private meeting.

This constitutes fraud upon the court under Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238 (1944), as Bland knowingly withheld material exculpatory evidence and misrepresented the status of the investigation to secure an indictment.

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3. Lack of Procedural Due Process at Charging Stage

I was never formally served with my indictment by an officer of the court.

I only learned of it after seeing it posted on Facebook.

I voluntarily turned myself in, where I was not read my Miranda rights and was pressured to become a CI against a personal friend before my first court date — a direct coercion tactic in violation of Garrity v. New Jersey, 385 U.S. 493 (1967).

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4. Conflict of Interest and Public Defender Failures

Jennifer Wells, my court-appointed public defender, represented both me and CI Tristan Crossley simultaneously, after I disclosed to her that he was the only person I had contact with regarding the alleged offense.

This created an irreconcilable conflict of interest under Holloway v. Arkansas, 435 U.S. 475 (1978).

Wells:

Showed me only one portion of my discovery involving sarcastic text messages about an ounce price; refused to show the rest.

Never provided Brady, Giglio, or Taylor disclosures.

Never requested a competency hearing despite my documented psychiatric disabilities, prescribed antipsychotics, and the fact that I was grieving the death of my father.

Coerced me into taking the first plea offer by saying: “If you don’t take this, it’ll go to trial and you’ll go to prison.”

Allowed Judge Tillett to order an illegal, unscheduled urinalysis during my plea hearing after I disclosed I used Delta-8 THC — a federally legal substance in North Carolina — and did nothing to stop it.

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5. Judicial Misconduct – Judge Jerry R. Tillett

Presided over all of CI Crossley's felony and probation violation cases yet refused to recuse himself from my case — a clear conflict of interest under Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009).

Bias & Retaliation:

Rolled his eyes when informed of my father's death.

Used the Delta-8 urinalysis to double my sentence from 15 to 30 days, despite Delta-8's legality.

Demonstrated psychopathic dominance over female attorneys and defendants in open court.

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6. Misapplication of Law – PWISD Methamphetamine Charge

My charge of Possession with Intent to Sell/Deliver Methamphetamine lacked every statutory predicate:

No packaging materials

No scales or measuring devices

No cash or proceeds

No observed or recorded sale

This overcharging was in violation of State v. Nettles, 170 N.C. App. 100 (2005), where possession without evidence of distribution intent cannot sustain a PWISD charge.

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7. ADA Violations

I am a qualified individual with disabilities under the Americans with Disabilities Act (ADA) due to:

Diagnosed psychiatric disorders

Current prescribed antipsychotic medications

Documented mental health treatment

The court and my defense counsel failed to:

Provide reasonable accommodations

Ensure my competency to enter a plea

Protect my due process rights under Tennessee v. Lane, 541 U.S. 509 (2004).

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8. July 15, 2025 Meeting with Former ADA Bland

Bland reiterated her false claim that I did not qualify for conditional discharge under G.S. 90-96, despite my being a first-time offender — a direct misstatement of law.

Stated the Sheriff's Office "did not have to disclose" my CI, contradicting Roviaro and Dark.

Told me to stop filing motions and pursuing post-conviction relief because it would "upset elected officials."

Offered a quid pro quo — a free expungement in 10 years if I remained silent.

ARGUMENT

The facts outlined above present not merely a pattern of negligence or error, but a deliberate, coordinated abuse of judicial, prosecutorial, and law enforcement authority within Dare County, North Carolina. This conduct constitutes a continuing violation of my constitutional rights, breaches multiple federal statutes, and offends the core principles of justice that the Department of Justice is bound to protect.

1. Coordinated Criminal Enterprise Under Color of Law

The actions of Judge Jerry R. Tillett, former ADA Jennifer Karpowicz Bland, DA Jeff Cruden, Sheriff Doug Doughtie, the Dare County Sheriff's Department, Clerk Dean Tolson, and my former defense counsel Jennifer Wells are not isolated incidents. They are interwoven acts in furtherance of a unified scheme:

To secure convictions without sufficient evidence;

To protect compromised confidential informants;

To suppress exculpatory information in violation of Brady v. Maryland, 373 U.S. 83 (1963), Giglio v. United States, 405 U.S. 150 (1972), and United States v. Roviaro, 353 U.S. 53 (1957);

To intimidate defendants into plea agreements under threat of retaliatory sentencing;

To shield judicial actors from accountability through nepotism, professional favors, and direct obstruction of post-conviction relief.

This is functionally a criminal racketeering pattern under 18 U.S.C. § 1962 (RICO), committed under the guise of lawful authority.

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2. Fraud Upon the Court — A Federal Crime, Not a Technicality

In my case, ADA Bland knowingly presented a felony indictment to a Grand Jury without the State Lab results, then actively misled both the court and defense regarding my eligibility under G.S. 90-96. This was not oversight. It was an intentional misrepresentation to secure an indictment — a violation of:

Hazel-Atlas Glass Co. v. Hartford-Empire Co., 322 U.S. 238 (1944) (fraud upon the court undermines finality of judgment);

18 U.S.C. § 1346 (scheme to deprive another of honest services);

42 U.S.C. § 1983 (deprivation of rights under color of state law).

Fraud upon the court is an offense against the integrity of the judicial system itself. It warrants not only vacatur of my conviction but also federal criminal investigation into all participating actors.

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3. Systemic Brady/Giglio Violations

The suppression of the CI's identity, criminal record, probation violations, and post-evidence misconduct is a direct violation of Brady and Giglio. Courts have repeatedly held that such suppression constitutes structural error — not subject to harmless-error review — requiring reversal.

Further, the pattern of Brady suppression is not limited to my case. Based on public records and corroborating witness statements, this is the standard operating procedure in Dare County: indict first, produce partial discovery later (if at all), and bury exculpatory CI information to preserve conviction rates.

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4. Judicial Conflicts of Interest Destroying the Appearance of Justice

Judge Tillett's refusal to recuse himself despite presiding over all of my CI's felony and probation cases is a Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) violation on its face. The U.S. Supreme Court held that even the probability of bias violates due process. Here, the probability became certainty:

Tillett's long-standing relationship with Bland, including an extramarital affair;

His documented history of judicial misconduct (2013, 2016, 2019);

His personal history of substance abuse and volatile temperament;

His retaliatory doubling of my sentence over a legal substance (Delta-8 THC) purely out of moral disdain.

No reasonable observer could view these proceedings as impartial.

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5. Prosecutorial and Law Enforcement Nepotism Corrupting the Process

Dare County’s law enforcement and prosecutorial offices operate under an incestuous web of nepotistic ties:

Sheriff Doughtie employing both his sons in the department;

Multiple family interlocks between the Doughtie, Coltrain, Cruden, Creech, Kidd, Gray, Lester, and Rippons families;

The rehiring of DA Cruden’s son into the Sheriff’s Department months after his DUI termination from KHPD.

This nepotism not only breeds selective prosecution (Oyler v. Boles, 368 U.S. 448 (1962)) but creates a closed system of impunity where misconduct is not investigated — because the investigators are the offenders’ relatives.

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6. ADA Violations Compounding Constitutional Harm

As a qualified individual with disabilities, I was entitled to reasonable accommodations, competency safeguards, and equal access to the judicial process under Title II of the ADA. None were provided. The Supreme Court in Tennessee v. Lane, 541 U.S. 509 (2004), recognized that access to courts is a fundamental right protected by the ADA. Dare County ignored this outright.

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7. Continuing Obstruction of Post-Conviction Relief

Since my conviction, Clerk of Superior Court Dean Tolson — a former probation officer — has stonewalled every post-conviction motion I’ve filed. This is a direct obstruction of justice under 18 U.S.C. § 1503 and a violation of my constitutional right to petition the courts for redress.

The obstruction is not accidental. It is designed to protect the reputations, careers, and political positions of the same officials who engineered my conviction.

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8. The Stakes for DOJ

This is not a parochial grievance. It is a textbook case of systemic constitutional collapse in a U.S. jurisdiction, implicating:

The Fourteenth Amendment's Due Process and Equal Protection Clauses;

The Sixth Amendment's right to effective assistance of counsel;

The Eighth Amendment's prohibition on excessive punishment;

Federal statutes governing ADA compliance, CI use, and honest services fraud.

By declining to act, DOJ risks signaling that judicial districts may operate as self-contained criminal enterprises without federal oversight — provided the misconduct is carefully coordinated across judges, prosecutors, law enforcement, and defense counsel.

PRAYER FOR RELIEF

WHEREFORE, based on the foregoing facts, legal authorities, and compelling evidence of systemic corruption, I respectfully demand that the United States Department of Justice, Civil Rights Division, Public Integrity Section, and any other relevant federal enforcement body:

1. Initiate a Full, Unrestricted Federal Investigation into the actions of:

Judge Jerry R. Tillett (Ret., now Board of Elections),

Former ADA Jennifer Karpowicz Bland,

District Attorney Jeff Cruden,

Sheriff Doug Doughtie,

Members of the Dare County Sheriff's Department,

Clerk of Superior Court Dean Tolson,

Former Public Defender Jennifer Wells,

And all other court officials, law enforcement personnel, and clerical staff implicated herein.

2. Pursue Criminal Charges against former ADA Jennifer Karpowicz Bland for, including but not limited to:

Fraud upon the court;

Conspiracy to obstruct justice;

Violations of 18 U.S.C. § 1346 (honest services fraud);

Violations of 18 U.S.C. § 1503 (obstruction of justice);

Misconduct in public office;

Criminal civil rights violations under 18 U.S.C. § 242.

3. Pursue Federal Civil Rights Enforcement Actions under 42 U.S.C. § 1983 and 42 U.S.C. § 14141 (pattern or practice of law enforcement misconduct) against the Dare County Sheriff's Department and associated prosecutorial offices.

4. Issue Immediate Preservation Orders to prevent destruction or alteration of any physical, digital, or documentary evidence held by:

The Dare County Sheriff's Department;

The Dare County Clerk of Court;

The District Attorney's Office;

The Public Defender's Office;

Any personal devices of the above-named officials.

5. Compel Disclosure of all grand jury records, investigative files, confidential informant agreements, probation violation records, and interdepartmental communications related to my case and all cases prosecuted with the same CI.

6. Seek Federal Removal of any sitting official found to have engaged in misconduct, whether through impeachment, judicial discipline, or revocation of licensure to practice law.

7. Establish Federal Oversight over Dare County criminal proceedings pending the completion of the investigation, to ensure due process and ADA compliance for all defendants.

8. Recommend Indictments for all officials, employees, or agents found to have engaged in criminal conduct, including conspiracy, fraud, perjury, obstruction, civil rights violations, and any other applicable offenses.

9. Initiate a federal criminal investigation into former ADA Jennifer Karpowicz Bland, including her prior marriage to a convicted cocaine dealer (Exhibit A), sworn witness testimony of cocaine use during her tenure (Exhibit C), and her role in securing an indictment in my case before lab results were returned (Exhibit B), with referral for prosecution under applicable federal and state statutes.

Respectfully submitted,
Devin Shawn Kilgore

EXHIBIT A – Documentary Evidence of Bland's Prior Marriage to a Known Cocaine Dealer

Official Dare County court and marriage records confirming the identity of Bland's ex-husband and his documented criminal history in cocaine trafficking.

Publicly accessible records from the Clerk of Court's office, ensuring authenticity and chain of custody.

EXHIBIT B – Proof of Indictment Prior to Lab Result Completion

Certified court timeline demonstrating indictment date vs. date of NC State Crime Lab results.

Demonstrates violation of North Carolina General Statutes and United States v. Roviaro, State v. Dark, establishing that prosecution proceeded without complete material evidence.

EXHIBIT C – Sworn Affidavits Regarding Bland's Cocaine Use

Multiple notarized affidavits from credible witnesses attesting to Jennifer Karpowicz Bland's cocaine use both prior to and during her tenure as Assistant District Attorney.

Affidavits to be prepared in compliance with 28 U.S.C. § 1746 (unsworn declarations under penalty of perjury).